

## **EXHIBIT 16**

Case 3:14-cv-00313-HSG Document 12-1 Filed 01/28/14 Page 1 of 2

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6 Attorneys for Defendants FEDERAL INSURANCE  
 COMPANY and CHUBB & SON INC.

8  
**UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

10  
 11 ANGELICA JONES,  
 12 Plaintiffs,

13 v.  
 14 FEDERAL INSURANCE COMPANY, a New  
 Jersey corporation, CHUBB & SON INC.  
 (incorrectly referred to as "a Division of Federal  
 Insurance Company") a New Jersey corporation,  
 and DOES 1 through 20, inclusive,

15 Defendants.

Case No. 3:14-cv-00313-RS  
 Judge: Hon. Richard Seeborg

**DECLARATION OF DOUGLAS A.  
 NORDSTROM IN SUPPORT OF  
 DEFENDANT CHUBB & SON INC.'S  
 NOTICE OF MOTION AND MOTION TO  
 DISMISS PLAINTIFF'S COMPLAINT**

Fed. Rule Civ. Proc. 12(b)(6)

**Hearing Date:** March 6, 2014  
**Hearing Time:** 1:30 p.m.  
**Courtroom:** 3

[Filed concurrently with Notice of Motion and  
 Motion; Memorandum of Points and  
 Authorities in Support Thereof; and [Proposed]  
 Order]

22  
 23  
 24 I, Douglas A. Nordstrom, declare as follows:

25 1. I am over the age of 18 and have personal knowledge regarding the matters set  
 26 forth in this Declaration and, if called upon as a witness, would competently testify as to the facts  
 27 set forth herein.

28

Case 3:14-cv-00313-HSG Document 12-1 Filed 01/28/14 Page 2 of 2

1       2. I am a Vice President and Treasurer of The Chubb Corporation and of Chubb &  
2 Son Inc. I am also a Senior Vice President and Treasurer of Chubb & Son, a Division of Federal  
3 Insurance Company.

4       3. Chubb & Son Inc. is a wholly owned subsidiary of The Chubb Corporation.

5       4. Chubb & Son Inc. is an inactive corporation and has not transacted business in  
6 California, or any other state, for over 15 years. Chubb & Son Inc. had previously acted as the  
7 U.S. Insurance Manager for certain U.S. insurance companies that are direct and/or indirect  
8 subsidiaries of The Chubb Corporation. Chubb & Son Inc., however, ceased providing any  
9 services to these insurers as of January 1, 1998. Since that time, Chubb & Son Inc. has not  
10 entered into any contracts with these insurers to provide underwriting or claims or any other  
11 services. Although Chubb & Son Inc. still exists as a New York corporation, it has had no  
12 employees since January 1, 1998. Chubb & Son Inc. does not do business as Chubb Group of  
13 Insurance Companies.

14       5. Effective January 1, 1998, Chubb & Son, a division of Federal Insurance  
15 Company assumed the operations of Chubb & Son Inc.

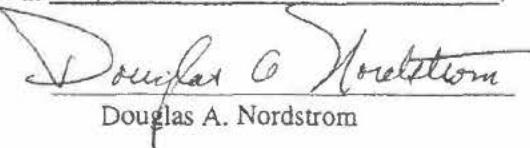
16       6. Although inactive, Chubb & Son Inc. serves as a holding company for some  
17 subsidiaries.

18       7. Chubb & Son Inc. is not an insurance company; it does not accept applications for  
19 insurance contracts or sell insurance; it does not issue insurance policies; it does not collect  
20 premiums; it does not service insurance policies; and it does not transact any other insurance  
21 business in any state or jurisdiction.

22       8. Chubb & Son Inc. did not issue the insurance policy at issue in this lawsuit.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
24 true and correct.

25 Dated this 27<sup>th</sup> day of January, 2014 at 11:26 AM.

  
Douglas A. Nordstrom

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27  
28 OC#46941

Case 3:14-cv-00313-HSG Document 2 Filed 01/21/14 Page 1 of 3

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11 and CHUBB & SON INC.

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION**

14 ANGELICA JONES,

15 Plaintiffs,

16 v.

17 FEDERAL INSURANCE COMPANY, a New  
18 Jersey corporation, CHUBB & SON, INC. (a  
19 Division of Federal Insurance Company), a New  
20 Jersey corporation, and DOES 1 through 20,  
21 inclusive,

22 Defendants.

23 Case No.:  
24 Courtroom:

25 **DEFENDANTS FEDERAL  
26 INSURANCE COMPANY AND  
27 CHUBB & SON INC.'S  
28 CERTIFICATION OF INTERESTED  
ENTITIES OR PERSONS**

29 Pursuant to Civil Local Rule 3-16, the undersigned, counsel of record for defendant  
30 Federal Insurance Company and Chubb & Son Inc., certifies that the following listed parties may  
31 have a pecuniary interest in the outcome of this case. These representations are made to enable  
32 the Court to evaluate possible disqualification or recusal:

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Case 3:14-cv-00313-HSG Document 2 Filed 01/21/14 Page 2 of 3

1           Federal Insurance Company is a wholly owned subsidiary of The Chubb Corporation, a  
2 publicly traded company on the New York Stock Exchange.

3           Chubb & Son Inc., which is an improper party in the State Action, is a wholly owned  
4 subsidiary of The Chubb Corporation. It is incorporated under the laws of the state of New  
5 York, and for purposes of diversity jurisdiction, has a principal place of business in New Jersey.  
6 However, while Chubb & Son Inc. exists as a New York corporation, it no longer conducts any  
7 business in any state or jurisdiction, has not had any employees since January 1, 1998, and has  
8 been inactive since January 1, 1998. While it is inactive, Chubb & Son Inc. serves as a holding  
9 company for some subsidiaries.

10

11 Dated: January 21, 2014

TRESSLER LLP

13 By:



Mary E. McPherson  
Yeun C. Yim

15 Attorneys for Defendants FEDERAL INSURANCE  
COMPANY and CHUBB & SON INC.

16 OC#46755

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Case 3:14-cv-00313-HSG Document 2 Filed 01/21/14 Page 3 of 3

*Angelica Jones v. Federal Ins. Co. et al.*

United States District Court, Northern District of California  
Oakland Division, Case No. TBD

**Our File No. 2246-754**

I hereby certify that on the date indicated below, I served the foregoing:

**DEFENDANTS FEDERAL INSURANCE COMPANY AND CHUBB & SON INC.'S CERTIFICATION OF INTERESTED ENTITIES OR PERSONS** with the Clerk of the Court using the CM/ECF system. Notification of such filing has also been sent to counsel or all represented parties, including the following:

James J. Matson, Esq.  
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Attorneys for Plaintiff ANGELICA JONES

**BY MAIL** (Fed.Civ.Pro. Rule 5 and CCP § 1013) - I deposited such envelope(s) for processing in the mailroom in our offices. I am "readily familiar" with the firm's practices of collection and processing correspondence for mailing. It is deposited with the U. S. Postal Service on that same day with postage thereon fully prepaid at Irvine, California, in the ordinary course of business. I am aware that on motion of a party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

Dated: January 21, 2014

/s/ Johnetta Caldwell

Johnetta Caldwell